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DIRECTOR OF HEALTH

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In reply, please refer to:
File:

June 25, 2021 U0660HM

CERTIFIED MAIL NO. 7020 1290 0001 2736 7728
RETURN RECEIPT REQUESTED **REQUEST FOR INFORMATION**

Mr. John Floyd
Department of the Navy
Commander Navy Region Hawaii
850 Ticonderoga Street, Ste. 110
JBPHH, Hawaii 96860-5101

Dear Mr. Floyd:

SUBJECT: Red Hill Bulk Fuel Storage Facility
Facility ID No. 9-102271

This is a follow-up to the September 28 to October 9, 2020, compliance inspection of the Red Hill Bulk Fuel Storage (RHBFS) facility. The inspection was conducted by Mr. Hugh Myers, Ms. Nicole Okino, Mr. Timothy Ugaitafa and Mr. Roy Ilaga of the Department of Health (DOH), Underground Storage Tank (UST) Section. The RHBFS facility consists of five (5) piers, 20 field constructed tanks, four (4) surge tanks, associated pipelines, two (2) Hickam airport hydrant system loops, and two (2) product recovery tank systems.

The purpose of this letter is to request the U.S. Navy (Navy) and the Defense Logistics Agency (DLA) to submit information and documents to complete the DOH-UST Compliance Inspection of the RHBFS facility. In the interest of protecting human health and the environment, this information is requested pursuant to Hawaii Revised Statutes (HRS) §342L-7, which reads:

For the purpose of developing or assisting in the development of any rule, conducting any study, taking any release response action, or enforcing this chapter, any owner or operator of an underground storage or tank system, and any person involved in response actions relating to any releases from these tanks or tank systems, upon the request of any duly authorized representative of the department, shall:

(1) furnish information relating to the tanks or tank systems, including tank equipment and contents and any response actions relating to release from the tanks or tank systems;
(2) conduct monitoring or testing; and
(3) permit the designated representative at all reasonable times to have access to, and to copy all records relating to the tanks or tank systems.

Pursuant to HRS §342L-7, the DOH hereby requests that the Navy and DLA provide responses to the items listed in the attached *"Notice of Inspection - Request for Information"* within 30 days upon receipt of this letter. Pursuant to HRS §342L-10(b)(2), if the Navy and DLA fail to provide the information requested herein, the DOH may assess fines against the Navy and DLA, up to $500.00 for each day they fail to provide the information. Please have your response to this request signed and dated by an authorized representative of the Navy with direct knowledge of the RHBFS facility and send to:

Ms. Roxanne Kwan, Supervisor
Underground Storage Tank Section
Solid and Hazardous Waste Branch
Hawaii Department of Health
2827 Waimano Home Road #100
Pearl City, Hawaii 96782

If any of the information provided is entitled to confidential treatment as either a trade secret or confidential business information, please submit a claim of confidentiality under HRS 342L-7(c) and 342L-15. Submit the claim with the response to this request and explain: 1) which information is considered confidential; and 2) why the information is confidential. Be detailed and descriptive as much as possible. With this information, the DOH can determine whether it can protect the information under HRS §342L-7(c) and §342L-15 and HRS Chapter 92F, since certain categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by the DOH, the information may be made available to the public without further notice.

The DOH appreciates your cooperation and welcomes any other information you can provide regarding this matter.

If you have any questions regarding this request, please contact Mr. Hugh Myers of our Underground Storage Tank Section at (808) 586-4230 or at hugh.myers@doh.hawaii.gov.

Sincerely,

GLENN HAAE, P.E., ACTING CHIEF
Solid and Hazardous Waste Branch

Enclosure: Notice of Inspection - Request for Information

Notice of Inspection - Request for Information

Red Hill Bulk Fuel Storage Facility compliance inspection from September 28 to October 09, 2020.

The Department of Health (DOH) requests the following documents or records *within thirty (30) days upon receipt of this letter:*

Red Hill Tanks

1) Provide a copy of the latest monthly walk through check list demonstrating compliance with Hawaii Administrative Rules (HAR) 11-280.1-36(a)(1).
2) At the time of inspection, Navy stated that the fluid dripping from the isolation and skin valves onto the lower access tunnel floor was valve lubricant. The DOH requested the following documentation at the time of the inspection and to date have not receive the documentation:

    a. Provide documentation identifying the type of fluid.
    b. Submit a copy of the safety data sheet information associated with the identified fluid.
    c. Provide prevention measures used to mitigate fluid from spilling, leaking, emitting, escaping, leaching or discharging onto tunnel floor.

3) We noted that there was a discrepancy in the type of fuel stored in Red Hill Tank F-15 as listed in the permit application and at the tank gauge. Provide the current product stored in Red Hill Tank F-15. Explain the discrepancy.
4) Red Hill Tank F-5 repair requirement: provide tank tightness test results with 0.1 gallon per hour leak rate that meets HAR 11-280.1-43(3).
5) Provide updated Clean, Inspect and Repair (CIR) schedule for all currently-in-use Red Hill tanks and the estimated date of return to service for all temporary-out-of-use Red Hill tanks.
6) Clarify the status of Red Hill Tanks F-1 and F-19, whether they are permanently or temporarily-out-of-use, and the date of last use and product last stored.

Tunnel Pipeline Access

1) Surface rust was noted on various sections of the pipeline and pipeline support. Pipeline close to the underground pumphouse has extreme surface corrosion due to water intrusion on the floor of the tunnel. Please provide date(s) of the next scheduled pipeline maintenance and testing.
2) The DOH noted that there was a black liquid substance, with non-petroleum odor, dripping from the lower access tunnel ceiling between Red Hill Tanks F-1 and F-2 and along the wall of the Tunnel Pipeline Access. Navy stated that it is from the "degraded form lumber" and the substance is not from the piping.

a. Provide documentation identifying the type of fluid, such as analytical testing.
b. If the fluid is a result of water infiltration and degraded organic matter, then provide description of what repairs the Navy is planning to ensure that integrity of the tunnel structure remains safe.
c. Provide prevention measures used to mitigate fluid from spilling, leaking, emitting, discharging, escaping, leaching or discharging onto tunnel floor.

3) Provide the date and results of any non-destructive examination pipeline testing on the tunnel pipeline to validate structural integrity.

Surge Tanks

1) Provide a copy of the latest monthly walk through check list demonstrating compliance with HAR 11-280.1-36(a)(1).
2) Surge Tank F-ST3 and F-ST4 repair requirement: Provide tank tightness test result with 0.1 gallon per hour leak rate that meets HAR §11-280.1-43(3).
3) Provide updated CIR schedule for all currently-in-use Surge Tanks and the estimated date of return to service for temporarily closed Surge Tanks.

Fuel Receipt Points: PAR, Piers, Truck Loading Racks (TLR)

1) Provide a description (include a map identifying the locations where spill equipment is used) and the quantity of spill prevention equipment used at the fuel receipt points for the piers and TLRs.
2) Provide spill prevention equipment testing results and documentation of the testing protocol used that is in accordance with nationally recognized testing procedure.
3) Provide current operational status, latest pipeline pressure test results, repair records, and/or future plans regarding Sierra Pier pipelines.

Product Dispensing Mechanism

1) Permit application indicated that the "Method of Product Dispensing" is pressurized for the UST system. Provide documentation of compliance with pressurized piping requirements in accordance with HAR 11-280.1-41(b)(5).

Outside Tunnel Pipeline Release Detection

1) In accordance with HAR 11-280.1-33(5), prior to the return to use of a repaired UST system, any repaired piping that routinely contains product must pass a line tightness test in accordance with section 11-280.1-44(2). Provide a copy of the line tightness test results.

Cathodic Protection System

1) Rectifier 10 was off due to maintenance work conducted on aboveground storage tank (AST) 55. Rectifier 10 protects AST 55 tank bottom and the underground piping connected to the pump house. Provide operational ("On-Off") status between July 15, 2018 to present for Rectifier 10; date Rectifier 10 was returned to service; and repair records for Rectifier 10, if any.

Airport Hydrant System

1) Provide a copy of the latest monthly walk through check list demonstrating compliance with HAR 11-280.1-36(a)(1).
2) Provide operational status for Diamond Head hydrant pit 21 (D) and documentation indicating debris has been removed from this hydrant pit.
3) Product Recovery Tanks (PRTs). The Navy expressed their assumption that the PRT tanks may fall under the exclusion clause as stipulated in HAR 11-280.1-10(b)(6) because the tanks were expeditiously emptied. At the time of inspection, the DOH verified that the PRTs were not expeditiously emptied and therefore subject to the UST regulations. Thus, the DOH is requesting the following information:

    a. Spill prevention equipment requirements
        i. Identify the type of spill prevention equipment used; and
        ii. Describe how this equipment or mechanism meets the requirement or justify why spill prevention is not needed.
    b. Overfill prevention equipment requirements
        i. Submit documentation on the "Overfill Alarm Setup" to include the following:
            1. Level at which the shut off flow valve completely shuts off;
            2. Level at which the "high alarm" is triggered; and
            3. Actual fuel level where it automatically starts running fuel from PRTs to ASTs.
        ii. Submit appropriate tank charts used for both PRTs to compare product level and its equivalence in gallons.
        iii. Describe how the overfill prevention equipment meets the regulations.
    c. Release detection requirements
        i. Tanks
            1. Submit the 3rd Party Certifications or Performance Claims for the following:
                a) Enraf;
                b) MTS gauge;
                c) Annular sensors; and
                d) All other sensors.

2. Confirm and submit the valid release detection method for the tanks, include any 3rd party certifications, full report of test results, 31-day release detection monitoring from July 2019 to current, if applicable, and technician's credentials.
    a) Tank Tightness Test; and
    b) Interstitial Monitoring.

ii. Piping

1. Confirm and submit the valid release detection method for the piping associated with PRT, include any 3rd party certifications, full report of test results, 31-day release detection monitoring from July 2019 to current, if applicable, and technician's credentials.
    a) Line Tightness Test - for sections 10 & 13, referenced in *2020 Annual Leak Detection Testing Report of 34 Sections of Petroleum Pipelines* dated March 6, 2020, specifically shown in Table 1-1; and/or
    b) Interstitial Monitoring.
2. Describe how piping segments between both PRTs and pump house operate, frequency of use, method of product dispensing (i.e. safe suction, unsafe suction and/or pressurized).

d. Repairs

i. Provide all PRT repair records and resolutions from July 15, 2019 to current, if applicable.

e. Others

As part of our inspection compliance report and to facilitate in the determination of PRT systems' compliance,

i. Provide photo documentation of the following (identify where the equipment is located; and label and describe each part of the equipment):
    1. Enraf with reading;
    2. MTS gauge;
    3. Audible alarm (both PRTs);
    4. Visual alarm (both PRTs);
    5. PRT DH and PRT Ewa containment sumps;
    6. Schematic operation workflow diagram i.e. the diagram shown on the monitor located inside each of the pump houses; and
    7. Programmable Logic Controller - console to show "PRT Overfill Valve Closed" indicator bulb; must show proof of operability.

ii. Provide a detailed schematic diagram to show the flow of product from the PRT to the hydrant pits to include, but not limited to, the ASTs, pump house, Hydrant Pits, etc.